

THE DUPONT LAW FIRM, LLP
ATTORNEYS AND COUNSELLORS AT LAW



BARBARA J. DUPONT

RALPH P. DUPONT

October 7, 2013

By E-Mail

(ForrestNYSDCchambers@nysd.uscourts.gov)

Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 730
New York, New York 10007

Re: *In re 650 Fifth Avenue and Related Properties*, 08 Civ. 10934 (KBF);
Hegna v. Islamic Republic of Iran, et al 11 Civ. 03761(KBF) (formerly
18 MS 0302 (Judgment No. 02-2472(RJH) (Mar. 27, 2009))

Dear Judge Forrest

We write as counsel for the Hegna Lienors to advise that our Additional Memorandum dated October 4, 2013, as on file, is the only filing we intend to make in support of the Hegnas' claim that all assets of Alavi, without exception, are subject to attachment in aid of execution and execution pursuant to the Foreign Sovereign Immunities Act sec. 1610(g)(1) within this Court's order to show cause and the Hegnas' personal property liens. (We understand that lien priority is not being decided at this point in the litigation.).

The Hegnas' claim is distinct from claims of other judgment creditors based, as they are, on other subsections of FSIA sec. 1610. All such other sections depend on proof of limiting conditions (for example, a commercial use) whereas the broad and robust enforcement provisions of Sec. 1610(g)(1) apply to all property of Alavi in which Iran or its governmental instrumentality Bonyad Mostazafan and/or Iran's Supreme Leader, in his governmental capacity, have any interest direct or indirect.

We have the honor to remain,

The Dupont Law Firm, LLP

By 

Ralph P. Dupont, Esq.

cc: counsel of record